

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

NIKKI BOLLINGER GRAE, Individually and on Behalf of All Others Similarly Situated,	)	Civil Action No. 3:16-cv-02267
	)	
Plaintiff,	)	Honorable Aleta A. Trauger
	)	
vs.	)	Magistrate Judge Jeffrey S. Frensley
	)	
CORRECTIONS CORPORATION OF	)	
AMERICA, et al.,	)	<u>DEMAND FOR JURY TRIAL</u>
	)	
Defendants.	)	
	)	
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**ADDITIONAL ATTACHMENTS TO DECLARATION OF MERYN C. N. GRANT IN  
SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

<u>Exhibit 72</u>	Contractor Performance Assessment Report (CPAR), Eden Correctional Center, dated Sept. 27, 2016
<u>Exhibit 73</u>	Contractor Performance Assessment Report (CPAR), Adams County Correctional Center, dated Oct. 31, 2016
<u>Exhibit 74</u>	After-Action Report, Disturbance, Adams County Correctional Center, dated July 27, 2012
<u>Exhibit 75</u>	Justice Strategies, "Privately Operated Federal Prisons for Immigrants: Expensive. Unsafe. Unnecessary," dated Sept. 13, 2012
<u>Exhibit 76</u>	Email from H. Lappin to J. Vanyur and W. Dalius re fyi Adams/BOP Contracted Facilities (Article from The Nation on deaths in facilities with strong focus on Adams)
<u>Exhibit 77</u>	Gang Fights in Prison Injure 22 and Kill One, N.Y. Times (Mar. 29, 2008)
<u>Exhibit 78</u>	Expert Report of Lucy P. Allen, pp. 1 - Ex. 1 p. 2

Exhibit 78 Expert Report of Lucy P. Allen, Ex. 1 p. 3-26

Exhibit 79 Expert Report of W. Scott Dalrymple, CFA, pp. 1 - Appx. B p.1

Exhibit 79 Expert Report of W. Scott Dalrymple, CFA, pp. Appx B, p.2 - Exs.pP. 6

Exhibit 80 Contractor Performance Assessment Report (CPAR), Northeast Ohio Correctional Center, dated Nov. 21, 2012

Exhibit 81 Contractor Performance Assessment Report (CPAR), Northeast Ohio Correctional Center, dated July 29, 2013

Exhibit 82 Contractor Performance Assessment Report (CPAR), Northeast Ohio Correctional Center, dated Feb. 17, 2015

Exhibit 83 Contractor Performance Assessment Report (CPAR), Northeast Ohio Correctional Center, dated April 21, 2016

Exhibit 84 CAR XV – Solicitation Number: RFP-PCC-0022, dated March. 25, 2013

Exhibit 85 CAR 15 Source Selection Decision 122914.pdf

Exhibit 86 Email from T. Barnes to B. Ferrell, cc C. Scott, M. Bodine, R. Bland, B. Verhulst and N. Metcalf re RFP-PCC-0022 (CAR 15)

Exhibit 87 CAR XV – Solicitation Number: RFP-PCC-0022, dated Dec. 29, 2014

Exhibit 88 Excerpts from the July 23, 2020 Deposition Transcript of R. Bland

Exhibit 89 Federal Acquisition Regulations (FAR) § 3.104

Exhibit 90 Excerpts from the July 30, 2020 Deposition Transcript of D. Hininger

Exhibit 91 Email from D. Hininger to D. Garfinkle, T. Grande, S. Groom, H. Lappin, L. Mayberry and K. White re CEO Update to CCA BOD

Exhibit 92 Letter from J. Bishop to N. Metcalf re: Cibola County Correctional Center Cure Notice

Exhibit 93 April 20, 2015 memo from J. Pryor to L. Otero re: Notice of Concern #2015-003 dated April 6, 2015

- Exhibit 94 Excerpts from the Dec. 19, 2019 Deposition Transcript of J. Baxter
- Exhibit 95 Excerpts from the Nov. 15, 2019 Deposition Transcript of K. White
- Exhibit 96 Excerpts from the July 28, 2020 Deposition Transcript of H. Lappin
- Exhibit 97 Excerpts from the Oct. 28, 2020 Deposition Transcript of W. Dalius
- Exhibit 98 Excerpts from the Jan. 9, 2019 Deposition Transcript of P. Swindle
- Exhibit 99 U.S. Department of Justice, Office of the Inspector General, Audit Division report entitled "The Federal Bureau of Prison's Efforts to Manage Inmate Health Care," February 2008, pp. 1-21
- Exhibit 99 U.S. Department of Justice, Office of the Inspector General, Audit Division report entitled "The Federal Bureau of Prison's Efforts to Manage Inmate Health Care," February 2008, pp. 22-68
- Exhibit 99 U.S. Department of Justice, Office of the Inspector General, Audit Divisor report entitled "The Federal Bureau of Prison's Efforts to Manage Inmate Health Care," February 2008, pp. 69-120
- Exhibit 100 Excerpts from the Nov. 5, 2019 Deposition Transcript of B. Verhulst
- Exhibit 101 Email from D. Mellendick to N. Kendig, B. Davis, K. Tracy, M. Mitchell, S. Hollemback, dated April 5, 2012
- Exhibit 102 Letter from B. Verhulst to W. Holstine re: Cibola County Correctional Center - Contract No. DJB19C011 Notice of Potential Deduction, dated Aug. 9, 2012
- Exhibit 103 Email from D. Hininger to K. White re :Cibola and Eden, dated Oct. 20, 2015
- Exhibit 104 Email from D. Hininger to M. Nace re: Cibola-CFM Review, dated April 27, 2015
- Exhibit 105 May 18, 2015 Letter from J. Bishop to N. Metcalf re: DJB1PC011, Cibola County Correctional Center (CCCC), Cure Notice dated January 9, 2015
- Exhibit 106 Contractor Performance Assessment Report (CPAR), Cibola County Correctional Center, dated Oct. 30, 2012
- Exhibit 107 Contractor Performance Assessment Report (CPAR), Cibola County Correctional Center, dated Nov. 8, 2013

DATED: November 20, 2020

Respectfully submitted:

/s/ Meryn C. N. Grant

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